

J. DOUGLAS WILSON (DCBN 412811)
Chief, Criminal Division

MATTHEW L. McCARTHY (CABN 217871)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
FAX: (415) 436-7234
Matthew.mccarthy@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

VERONICA GUZMAN,

Defendant.

CASE NO. 11-0825 SI

~~[PROPOSED]~~ STIPULATED ORDER
CONTINUING CHANGE OF PLEA HEARING

[PROPOSED] STIPULATED ORDER CONTINUING CHANGE OF PLEA
CR 11-0825 SI

1 The above-captioned case is currently scheduled for a change-of-plea on April 18,
2 2014. However, the parties need additional time to finalize the proposed disposition in this matter in
3 light of certain outstanding factual and legal issues in the case. Accordingly, the parties jointly request
4 that the change-of-plea be continued to Friday, June 6, 2014.

5 Further, the parties stipulate and jointly request that time be excluded from the Speedy Trial Act
6 calculations from April 18, 2014 through June 6, 2014 for effective preparation and continuity of
7 counsel. The parties agree that the ends of justice served by granting such a continuance outweighed the
8 best interests of the public and the defendants in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).
9 Pursuant to 18 U.S.C. § 3161, and Crim. Loc. Rule 47-2(c), there are seventy (70) days remaining before
10 the trial in this case must commence.

11 IT IS SO STIPULATED.

12
13 DATED 4-16-2014

MELINDA HAAG
United States Attorney
Northern District of California

15 /s/
16 MATTHEW L. McCARTHY
Assistant United States Attorney

18
19 DATED 4-16-2014

/s/
MARK VERMEULEN
Attorney for Defendant

[PROPOSED] ORDER

For good cause shown, this matter shall be added to the Court's calendar on Friday, June 6, 2014 at 11:00 a.m. for change of plea.

In addition, for the reasons stated above, the Court finds that an exclusion of time from April 18, 2014 through June 6, 2014 is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161 (h)(7)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

Pursuant to 18 U.S.C. § 3161, and Crim. Loc. Rule 47-2(c), there are seventy (70) days remaining before the trial in this case must commence.

IT IS SO ORDERED.

DATED 4/17/14



HON. SUSAN ILLSTON
United States District Court Judge